

11 November 2021  
**Delivered by email**

MM Consultation 2021  
Planning Policy Team  
Brentwood Borough Council  
Town Hall, Ingrave Rd  
Brentwood  
Essex, CM15 8AY

Ref: BELR3026

Dear Sir / Madam

## **BRENTWOOD LOCAL PLAN MAIN MODIFICATIONS - REPRESENTATIONS ON BEHALF OF BELLWAY HOMES**

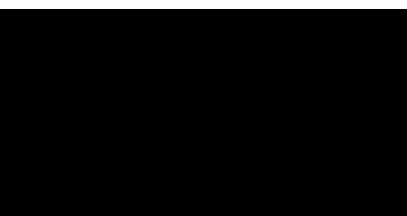
We write on behalf of our client Bellway Homes to provide brief representations to the Brentwood Local Plan Main Modifications. Bellway's previous representations were submitted under reference ID 6031.

Bellway Homes are promoting land to the west of Basildon for residential development which also includes land within Brentwood Borough, including land in the eastern part of the area to be allocated under Policy R01 (Dunton Hills Garden Village). Land to the west of Basildon is also being promoted by other parties, including Crest Nicholson and Persimmon.

We note that the schedule of Main Modifications include a number of proposed amendments to policies in the draft Local Plan, however the purpose of these representations focuses on Policy R01. Bellway maintain their comments set out at earlier stages of the Plan-making process.

The first point to note is that Bellway consider that the land they are promoting within the proposed Dunton Hills Garden Village can make a meaningful contribution to development within the Garden Village. The extent of Bellway's interest in the land within the proposed allocation is shown in representations previously submitted on their behalf by Aecom. The assertion that the land promoted by Bellway within Brentwood may play a meaningful role in the Garden Village is demonstrated by the fact that it is identified for development in the Framework Masterplan submitted with application 21/01525/OUT.

We understand that the Pre-Submission version of the Local Plan included Policy R01(II) which required (at C(f)) the provision of "a green infrastructure buffer / wedge on the eastern boundary with Basildon Borough to achieve visual separation to help significantly improve the landscaped and habitat value thus reinforcing the beneficial purpose and use of the green belt in that zone". As Bellway's previous representations have set out, if Dunton Hills Garden Village is allocated, then the role of the land to the east, and its relationship to the Green Belt purposes should be seen in that context. Representations submitted on behalf of Bellway (by Aecom) explained that this matter needs careful consideration in advance of submission in light of Basildon's representations and their erroneous position on Green Belt coalescence and countryside encroachment in their draft plan (which fails to



allocate sufficient land to meet needs). Aecom set out that Brentwood should provide further clarity that this separation can be achieved without sterilising large tracts of the allocation and that a modest multifunctional green gap running north-south in close proximity to the Borough boundary would be a proportionate response in this location.

Whilst we welcome the deletion of the text which requires land on the eastern boundary of Dunton Hills Garden Village to include measures which reinforce “the beneficial purpose and use of the green belt in that zone” (for the reasons set out in Bellway’s previous representations, we set out comments below in relation to revised wording of Policy R01(l) which appears to have similar connotations.

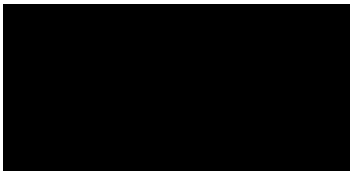
The proposed Main Modifications to Policy R01(l)(2)(A)(e) require the masterplan to “show all structural landscaping and the treatments to be provided (including boundary treatments and measures to ensure visual separation from Basildon)”

Should the Dunton Hills Garden Village be allocated, this should not prejudice, or predetermine any decisions which might be taken by the adjoining authority regarding the westwards expansion of Basildon.

We note that the Main Modifications reduce the extent to which Dunton Hills Garden Village will deliver homes during the Plan-period. As set out above, the land controlled by Bellway which lies within the proposed allocation is shown as being developed on the Framework Masterplan submitted with application 21/01525/OUT and so can make a meaningful contribution to delivery within the overall scheme. This is particularly the case as it adjoins land identified as comprising early phases of the development proposed by application 21/01525/OUT..

We trust that these representations are useful and would be happy to provide further explanation if that were considered useful.

Yours sincerely



David Murray-Cox  
**Director**

